

SETTLEMENT AGREEMENT -- ATTACHMENT C
RELEASES

RELEASE

Tina Gray-Rand ("Releasor"), in consideration of changes to Rules and Procedures of the Vermont Department of Children and Families ("DCF") as set forth in the Settlement Agreement executed by Jessica Radbord, Esq. and Rachel Smith, Esq., does hereby remise, release, and forever discharge, and by these presents do for their children, heirs, executors, administrators, successors, and assigns remise, release, and forever discharge the State of Vermont and its current or former employees, officers, directors, agents, contractors, adjusters, attorneys, representatives, members, heirs, executors, administrators, successors and assigns ("Releasees"), of and from any and all manner of action and actions, cause and causes of action, suits, debts, damages, judgments, executions, claims and demands whatsoever, in law or in equity, which Releasor ever had, now has, or which Releasor's children, heirs, executors, administrators, successors and assigns hereafter can, shall, or may have against the Releasees, upon, or by reason of any matter, cause, or thing whatsoever, from the beginning of the world to the day of the date of this Release on account of all claims asserted in the following case: *Gray-Rand, et al. v. Agency of Human Services, et al.*, Civil Action No. 2:21-cv-178-cr ("Lawsuit"), and all claims that are known or could have been discovered with a reasonable investigation, except that this Release shall not release the right to make claims for conduct occurring after the date of the Release, or the right to enforce the Settlement Agreement resolving the claims asserted in the Lawsuit. This Release does not preclude the Releasor from exercising the right to a fair hearing regarding their own individualized benefits determinations before the Human Services Board as provided in 3 V.S.A. § 3091.

Releasor acknowledges they had ample time to consult with their attorneys and others prior to signing this release, is competent to sign this release, and does so voluntarily and without duress.

IN WITNESS WHEREOF, I have hereunto set my hand and seal this 17th day of Aug, 2021.

By: Tina Gray-Rand

RELEASE

Michael Hammond ("Releasor"), in consideration of changes to Rules and Procedures of the Vermont Department of Children and Families ("DCF") as set forth in the Settlement Agreement executed by Jessica Radbord, Esq. and Rachel Smith, Esq., does hereby remise, release, and forever discharge, and by these presents do for their children, heirs, executors, administrators, successors, and assigns remise, release, and forever discharge the State of Vermont and its current or former employees, officers, directors, agents, contractors, adjusters, attorneys, representatives, members, heirs, executors, administrators, successors and assigns ("Releasees"), of and from any and all manner of action and actions, cause and causes of action, suits, debts, damages, judgments, executions, claims and demands whatsoever, in law or in equity, which Releasor ever had, now has, or which Releasor's children, heirs, executors, administrators, successors and assigns hereafter can, shall, or may have against the Releasees, upon, or by reason of any matter, cause, or thing whatsoever, from the beginning of the world to the day of the date of this Release on account of all claims asserted in the following case: *Gray-Rand, et al. v. Agency of Human Services, et al.*, Civil Action No. 2:21-cv-178-cr ("Lawsuit"), and all claims that are known or could have been discovered with a reasonable investigation, except that this Release shall not release the right to make claims for conduct occurring after the date of the Release, or the right to enforce the Settlement Agreement resolving the claims asserted in the Lawsuit. This Release does not preclude the Releasor from exercising the right to a fair hearing regarding their own individualized benefits determinations before the Human Services Board as provided in 3 V.S.A. § 3091.

Releasor acknowledges they had ample time to consult with their attorneys and others prior to signing this release, is competent to sign this release, and does so voluntarily and without duress.

IN WITNESS WHEREOF, I have hereunto set my hand and seal this 18 day of 8, 2021.

By: Michael Hammond

August

RELEASE

William Brayer ("Releasor"), in consideration of changes to Rules and Procedures of the Vermont Department of Children and Families ("DCF") as set forth in the Settlement Agreement executed by Jessica Radbord, Esq. and Rachel Smith, Esq., does hereby remise, release, and forever discharge, and by these presents do for their children, heirs, executors, administrators, successors, and assigns remise, release, and forever discharge the State of Vermont and its current or former employees, officers, directors, agents, contractors, adjusters, attorneys, representatives, members, heirs, executors, administrators, successors and assigns ("Releasees"), of and from any and all manner of action and actions, cause and causes of action, suits, debts, damages, judgments, executions, claims and demands whatsoever, in law or in equity, which Releasor ever had, now has, or which Releasor's children, heirs, executors, administrators, successors and assigns hereafter can, shall, or may have against the Releasees, upon, or by reason of any matter, cause, or thing whatsoever, from the beginning of the world to the day of the date of this Release on account of all claims asserted in the following case: *Gray-Rand, et al. v. Agency of Human Services, et al.*, Civil Action No. 2:21-cv-178-cr ("Lawsuit"), and all claims that are known or could have been discovered with a reasonable investigation, except that this Release shall not release the right to make claims for conduct occurring after the date of the Release, or the right to enforce the Settlement Agreement resolving the claims asserted in the Lawsuit. This Release does not preclude the Releasor from exercising the right to a fair hearing regarding their own individualized benefits determinations before the Human Services Board as provided in 3 V.S.A. § 3091.

Releasor acknowledges they had ample time to consult with their attorneys and others prior to signing this release, is competent to sign this release, and does so voluntarily and without duress.

IN WITNESS WHEREOF, I have hereunto set my hand and seal this 13 day of Aug, 2021.

By: William D Brayer

RELEASE

Taylor Cook ("Releasor"), in consideration of changes to Rules and Procedures of the Vermont Department of Children and Families ("DCF") as set forth in the Settlement Agreement executed by Jessica Radbord, Esq. and Rachel Smith, Esq., does hereby remise, release, and forever discharge, and by these presents do for their children, heirs, executors, administrators, successors, and assigns remise, release, and forever discharge the State of Vermont and its current or former employees, officers, directors, agents, contractors, adjusters, attorneys, representatives, members, heirs, executors, administrators, successors and assigns ("Releasees"), of and from any and all manner of action and actions, cause and causes of action, suits, debts, damages, judgments, executions, claims and demands whatsoever, in law or in equity, which Releasor ever had, now has, or which Releasor's children, heirs, executors, administrators, successors and assigns hereafter can, shall, or may have against the Releasees, upon, or by reason of any matter, cause, or thing whatsoever, from the beginning of the world to the day of the date of this Release on account of all claims asserted in the following case: *Gray-Rand, et al. v. Agency of Human Services, et al.*, Civil Action No. 2:21-cv-178-cr ("Lawsuit"), and all claims that are known or could have been discovered with a reasonable investigation, except that this Release shall not release the right to make claims for conduct occurring after the date of the Release, or the right to enforce the Settlement Agreement resolving the claims asserted in the Lawsuit. This Release does not preclude the Releasor from exercising the right to a fair hearing regarding their own individualized benefits determinations before the Human Services Board as provided in 3 V.S.A. § 3091.

Releasor acknowledges they had ample time to consult with their attorneys and others prior to signing this release, is competent to sign this release, and does so voluntarily and without duress.

IN WITNESS WHEREOF, I have hereunto set my hand and seal this 13 day of 8, 2021.

By: 